

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FUJIAN MINGTA TOYS CO. LTD.,

Plaintiff,

v.

**THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A”,**

Defendants.

Civil Action No. 1:24-cv-05625

PLAINTIFF’S MOTION TO FILE UNDER SEAL

Plaintiff Fujian Mingta Toys Co. Ltd. files this motion to file the following documents under seal: (1) Schedule A to the Complaint which lists Defendants’ Online Marketplace Accounts; (2) Exhibits 1-1 and 1-5 to the Complaint which contains Defendants’ infringing product listings; (3) Exhibit 2 to the Complaint which contains the checkout pages of Defendants’ Online Marketplace Accounts; (4) Exhibit 3 to the Complaint which contains Plaintiff’s design patent; and (5) Exhibit 4 to the Complaint which contains Plaintiff’s copyright registration.

Sealing this portion of the file is necessary to prevent Defendants from learning of these proceedings prior to the execution of a temporary restraining order. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence and the hiding or transferring of assets to foreign jurisdictions, which would frustrate the purpose of the underlying law and would interfere with this Court’s power to grant relief. Once the temporary restraining order has been served on the relevant parties and the requested actions are taken, Plaintiff will move to unseal these documents.

DATED: July 3, 2024

Respectfully submitted,

By: /s/ Nicholas Najera
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